

Message

From: Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]
Sent: 6/20/2018 1:26:14 PM
To: Patefield, Scott [Patefield.Scott@epa.gov]
Subject: RE: Utah storage tank requirements

I'll come down to chat...

Joe Wilwerding

USEPA Region 8, Office of Enforcement, Compliance & Environmental Justice
1595 Wynkoop Street, Denver, CO 80202-1129
(303) 312-6729, wilwerding.joseph@epa.gov

From: Patefield, Scott
Sent: Wednesday, June 20, 2018 7:14 AM
To: Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>
Subject: RE: Utah storage tank requirements

Ex. 5 Deliberative Process (DP)

From: Wilwerding, Joseph
Sent: Wednesday, June 20, 2018 6:58 AM
To: Patefield, Scott <Patefield.Scott@epa.gov>
Subject: RE: Utah storage tank requirements

Scott, had a quick call with Joe Randolph yesterday. He explained that 307-506-3(3) exempts storage vessels at a site operating under an approval order, and in theory, all major and minor sites should receive approval orders/permits through their permitting group. So the green highlight requirements would only apply to sources operating below their 5 tpy VOC de minimus level. The yellow highlight provisions should still apply everywhere.

He didn't know what percentage of sources may have permit-required tank controls, but that is something we can dig into more if you'd like.

Joe Wilwerding

USEPA Region 8, Office of Enforcement, Compliance & Environmental Justice
1595 Wynkoop Street, Denver, CO 80202-1129
(303) 312-6729, wilwerding.joseph@epa.gov

From: Wilwerding, Joseph
Sent: Tuesday, June 19, 2018 7:02 AM
To: Patefield, Scott <Patefield.Scott@epa.gov>
Subject: Utah storage tank requirements

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